Competitive Telecommunications Association ADVANCING
GLOBAL
COMMUNICATIONS
THROUGH
COMPETITION

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August 29, 2001

## Via Hand Delivery

Ms. Magalie Roman Salas Secretary Federal Communications Commission 445 12<sup>th</sup> Street, S.W. Washington, D.C. 20554

Re: Ex Parte Presentation in CC Docket No. 96-98

Dear Ms. Salas:

Pursuant to Section 1.1206 of the Commission's rules, the Competitive Telecommunications Association ("CompTel") hereby gives notice that yesterday it met with Dorothy Attwood, Jeff Carlisle, Michelle Carey and Julie Veach of the Common Carrier Bureau. CompTel was represented at the meeting by Robert Aamoth of Kelley Drye & Warren and the undersigned attorney. CompTel member WorldCom, Inc. ("WorldCom") also attended the meeting and was represented by Mary Brown and Hank Hultquist. Mr. Aamoth also appeared on behalf of ITC^DeltaCom Communications, Inc. ("ITC^DeltaCom").

During the meeting, the parties urged the Commission to take actions to assist competitive local exchange carriers ("CLECs") in obtaining access to the unbundled network element ("UNE") combination known as the enhanced extended link ("EEL") for the provision of local exchange services to customers. While the parties support broad generic relief on this issue, including the removal of the interim usage restrictions, the parties also support more targeted relief, which will promote the ability of CLECs to compete in local markets against incumbent local exchange carriers ("ILECs"). In particular, both WorldCom and ITC^DeltaCom have filed waiver petitions to obtain non-discriminatory access to EELs consistent with the Commission's *Supplemental Order Clarification* in the above-referenced proceeding. The parties urge the Commission to grant both petitions expeditiously.

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CompTel and ITC^DeltaCom emphasized that some CLECs will be able to enter the local market, particularly in smaller cities and towns, if they are able to obtain DS1 EELs from the customer's premises to the CLEC's point of presence with channelized facility usage of a DS3 entrance facility. As indicated in its waiver petition, ITC^DeltaCom is ready to convert more than 3,000 circuits to DS1 EELs under this configuration. ITC^DeltaCom indicated that obtaining this type of EELs is critical to its ability to enter new markets where there are no other CLECs today, and to remain a strong competitor in markets where it is the only CLEC competing against the ILEC. As a result, granting the pending waiver petitions will spell the difference between certain cities and towns having some competitive alternatives to the ILECs versus having no competitive alternatives. Granting these petitions would be a significant step towards promoting more local competition in currently under-served areas.

Please direct any inquiries to the undersigned attorney.

Sincerely,

Jonathan Lee Vice President,

Constan D. Les

Regulatory Affairs

cc (via electronic mail): D.Attwood

J. Carlisle

J. Veach

M. Carey

R. Aamoth

M. Brown

H. Hultquist